

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

November 8, 2000

FCC MAIL ROOM

Ms. Cassandra Carr
Senior Executive Vice President – External Affairs
SBC Communications, Inc.
175 E. Houston Street
San Antonio, TX 78205

2000 NOV 16 A 10: 59

RECEIVED

RE: *SBC/Ameritech Merger Order*, CC Docket No. 98-141, ASD File No. 99-49

Dear Ms. Carr:

Under the *SBC/Ameritech Merger Order*, SBC Communications, Inc., (“SBC”) is required to submit performance data that measure the quality of service that SBC provides to competitive local exchange carriers (“CLECs”).¹ This letter approves a request of SBC to implement certain changes to the performance measurements to conform with changes made by the Texas Commission, and it specifies a uniform format for future filings.

SBC made certain changes to performance measurements following a semi-annual review of the performance plan in June 2000 by the Common Carrier Bureau and SBC. At that time, SBC indicated that it wanted to make additional changes that were being considered by the Texas Commission after the Texas Commission adopted them. In September 2000, SBC notified the Bureau that the Texas Commission had adopted changes (referred to as “Version 1.7”)² and it requested permission to incorporate those changes for all the reporting SBC states except California and Nevada.³

Based on our review, we believe the proposed plan will result in a clearer picture of SBC’s progress in opening its local market to competitors. Accordingly, SBC should implement these changes as follows. SBC should implement the changes in the Southwestern Bell states according to the schedule approved by the Texas Commission. In the Ameritech states, SBC should make the changes by January 20, 2001.⁴ SBC, however, should not make any change that would exclude data from the FCC

¹ Applications of Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95, and 101 of the Commission’s Rules, CC Docket 98-141, *Memorandum Opinion and Order*, 14 FCC Rcd 14,712, Appendix C, ¶¶ 23-24 (1999) (“*SBC/Ameritech Merger Order*”).

² Version 1.7 modifies the performance measurements in a number of ways. The most significant changes include additional disaggregations, removal of the critical-z analysis for some measurements, and refinements of the business rules for some measurements.

³ See Order No. 13, Approving Modifications to Performance Remedy Plan and Performance Measurements, Project Nos. 20400 & 22165 (Tex. PUC July 2000). I understand that SBC has not proposed any changes to the California and Nevada performance measurements because the California Commission has not adopted any changes since the beginning of this semi-annual review. The *Merger Order* requires SBC to notify the Bureau of any changes the California Commission adopts. *Id.* at Appendix C, Attachment A, ¶ 4. On May 30, 2000, the Bureau approved SBC’s implementation of Version 1.6 for the Southwestern Bell states. See Letter from Carol E. Matthey, Deputy Chief, FCC, to Marian Dyer, Vice President – Federal Regulatory, SBC Telecommunications, Inc. (May 30, 2000).

⁴ In other words, the December 2000 results for the Ameritech states will reflect Version 1.7. I understand that

performance measurements that would in turn be captured in a Texas-only measurement.⁵ Finally, SBC should submit to the Bureau an electronic copy of the new business rules.

In the past, SBC has not filed its data in a uniform format for each state, which has made analysis of the data by the Commission and the public more difficult. After discussing this with my staff, you have agreed to file the reports in a uniform format beginning with your November 20, 2000 filing. The uniform filings should contain one spreadsheet for each region. Each spreadsheet should contain a row for each measurement organized by state⁶ and the twelve columns listed below:

Column Number	Column Label	Contents/Comments:
1	Date	Six position field formatted as mm-yyyy
2	Measure ID	Based on existing reporting: SWBT PM and disaggregation identifier (e.g. 1-02), Pacific Bell ID number (e.g. 1.2003), Ameritech tracking number.
3	Description	Existing descriptor
4	State ID	Two letter abbreviation
5	CLEC Numerator	
6	CLEC Denominator	
7	CLEC Result	
8	ILEC Result	There should be no company specific reference in the label.
9	Benchmark	
10	Z Test	The Z should be reported wherever it is calculated. Where no Z is available, there should be an explanatory reference (insufficient CLEC observations, insufficient ILEC observations, ILEC variance equal to zero).
11	Affiliate Result	
12	Units	Unit of analysis for the metric, e.g. seconds, hours, days, rate per hundred lines in service, percent

(Continued from previous page) _____

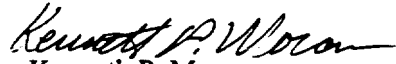
more time is necessary for implementation in the Ameritech states, which will be upgrading from Version 1.5 to Version 1.7.

⁵ This involves exclusions for performance measurements 1, 6(c), 12(c), and 13(c). For example, Version 1.7 for performance measurement 1, *Percent Firm Order Confirmations Returned on Time for LSR Requests* excludes DSL orders. Although SBC will include these DSL orders in another measurement reported to the Texas Commission, that measurement is not included in the 20 FCC Performance Measurements. If the Bureau allowed SBC to implement these exclusions, therefore, SBC would no longer capture in the FCC Performance Measurements Firm Order Confirmations for DSL orders.

⁶ For a multi-state region, the filing should list all the performance measurements, one per row, then the second state, etc.

Please do not hesitate to contact me if I can be of further assistance. You may also contact Mark Stone in the Accounting Safeguards Division directly at (202) 418-0816 for further information on this matter.

Sincerely,



Kenneth P. Moran
Chief, Accounting Safeguards Division

CC: Ms. Christine Jines, Executive Director – Federal Regulatory
SBC Telecommunications, Inc.